



Brian J. Raymond

Director, Technology Policy

November 21, 2011

Chairman Julius Genachowski
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: In the matter of the proposed extension of Part 4 of the Commission's Rules
Regarding Outage Reporting to Interconnected Voice Over Internet Protocol
Service Providers and Broadband Internet Service Providers, PS Docket No. 11-82**

Dear Chairman Genachowski and Commissioners Copps, McDowell, and Clyburn:

On behalf of the National Association of Manufacturers (NAM), the nation's largest industrial trade association representing manufacturers in every industrial sector and in all 50 states, we are writing to express our concern with the proposed rules to increase service outage reporting requirements to Broadband Internet Service Providers (ISPs) and Interconnected VoIP providers. We support the Commission's goals of ensuring reliable access to 9-1-1 systems but believe these proposed rules will do little more than increase the regulatory burden and associated costs on manufacturers and other customers.

The proposed rules are overly broad and will not achieve the desired goal of identifying when IP networks are unable to deliver emergency traffic. This extremely costly new regulatory requirement on our nation's telecommunications sector would therefore translate directly into higher costs to their customers.

In a time of economic recovery where capital is extremely scarce, every dollar diverted from productive use creates additional pressure on jobs and economic growth. In this environment, now is not the time for additional unnecessary or cost-ineffective regulation that will dampen economic growth and will continue to hold down job creation.

NAM welcomed the very clear, new direction on regulation announced earlier this year by President Obama through his Executive Order 13563. It suggests that benefits of new regulations must justify costs, that regulations should be tailored to impose the least burden on society, that the regulatory option chosen should create the most net benefits, and that performance objectives should guide the rules rather than a particular method of compliance. Unfortunately, the FCC's outage requirement moves in the opposite direction.

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In this context, we encourage the Commission to reexamine these proposed rules. We urge the Commission to collaborate with industry on the most effective and efficient method to ensure public access to emergency services is delivered without stifling the growth of manufacturers by increasing the cost of doing business in the United States.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Raymond", with a large, sweeping flourish extending upwards and to the right.

Brian J. Raymond